



BellSouth Telecommunications, Inc.
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

joelle.phillips@bellsouth.com

November 13, 2001

REC'D TN
REGULATORY AUTH.

Joelle J. Phillips

Attorney

01 NOV 13 PM 1 55

OFFICE OF THE
EXECUTIVE SECRETARY
615 214 6311
Fax 615 214 7406

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Complaint of BellSouth Telecommunications, Inc. Regarding the Practices of Global Crossing Telecommunications, Inc. in the Reporting of Percent Interstate Usage for Compensation for Jurisdictional Access Services*
Docket No. 01-00913

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Statement of Issues and BellSouth's First Data Requests to Global Crossing. Copies of the enclosed are being provided to counsel for Global Crossing.

Cordially

Joelle Phillips

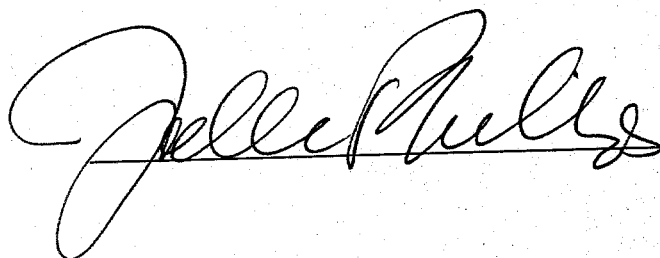
JJP:ch

CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2001, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☐ Hand
- ☐ Mail
- ☒ Facsimile
- ☐ Overnight

Henry Walker, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

A handwritten signature in cursive script, appearing to read "J. Lee Phillips", written over a horizontal line.

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In re: *Complaint of BellSouth Telecommunications, Inc. Regarding the Practices of Global Crossing Telecommunications, Inc. in the Reporting of Percent Interstate Usage for Compensation for Jurisdictional Access Services*

Docket No. 01-00913

BELLSOUTH TELECOMMUNICATIONS, INC.'S
STATEMENT OF ISSUES

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to the Hearing Officer's Scheduling Order, submits the following issue to be considered in this case:

What is the correct amount owed by Global Crossing to BellSouth with respect to terminating access service provided in Tennessee, for the period between 1994 and 2000, under applicable law? Included in this issue are any and all issues bearing on the correct PIU factor for Global Crossing.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By:


Guy M. Hicks

Joelle J. Phillips

333 Commerce Street, Suite 2101
Nashville, TN 37201-3300
615/214-6301

Wayne T. McGaw (La. Bar #9302)
365 Canal Street, Room 3060
New Orleans, LA 70130

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In re: *Complaint of BellSouth Telecommunications, Inc. Regarding the Practices of Global Crossing Telecommunications, Inc. in the Reporting of Percent Interstate Usage for Compensation for Jurisdictional Access Services*

Docket No. 01-00913

**BELLSOUTH TELECOMMUNICATIONS, INC.'S FIRST
DATA REQUESTS TO GLOBAL CROSSING**

BellSouth Telecommunications, Inc. ("BellSouth") hereby requests GLOBAL CROSSING, Inc. ("Global Crossing") to provide answers in response to the following Data Requests:

INSTRUCTIONS

- (a) If any response required by way of answer to these Data Requests is considered to contain confidential or protected information, please furnish this information subject to a protective agreement.
- (b) If any response required by way of answer to these Data Requests is withheld under a claim of privilege, please identify the privilege asserted and describe the basis for such assertion.
- (c) These Data Requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you.
- (d) If any Data Request cannot be responded to in full, answer to the extent possible and specify the reason for your inability to respond fully. If you object to any part of a Data Request, answer all parts of the Data Request to which

you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

(e) These Data Requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these Data Requests subsequently become known or should your initial response be incorrect or untrue.

DEFINITIONS

(a) "Global Crossing" means Global Crossing, Inc., any predecessors in interest, its parent, subsidiaries, and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of Global Crossing.

(b) "You" and "your" refer to Global Crossing.

(c) "Person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

(d) "And" and "or" shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these Data Requests information that would not otherwise be brought within their scope.

(e) "Identification" or "identify" when used in reference to: (i) a natural individual, requires you to state his or her full name and residential and business address; (ii) a corporation, requires you to state its full corporate name and any names under which it does business, the state of incorporation, and the address of its

principal place of business; (iii) a document, requires you to state the number of pages and the nature of the document (e.g., a letter or memorandum), its title, its date, the name or names of its authors and recipients, and its present location or custodian; (iv) a communication, requires you, if any part of the communication was written, to identify the document or documents which refer to or evidence the communication, and to the extent that the communication was not written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

INTERROGATORIES

1. Identify all persons participating in the preparation of the answers to these Data Requests and supplying information used in connection therewith.
2. If Global Crossing has documents that it may rely upon or introduce into evidence at the hearing of this matter, please identify all such documents.
3. Identify any expert witnesses Global Crossing plans to have testify at the hearing of this matter.
4. Identify any documents Global Crossing has provided to any persons identified in Response to Interrogatory No. 3.
5. Identify each and every long distance carrier for whom Global Crossing transports such traffic to BellSouth.
6. State with specificity the reasons that Global Crossing's reported interstate usage increased from approximately zero minutes of use in January 1999 to approximately 4,000,000 minutes of use in April 1999.
7. Is Global Crossing currently transporting traffic to BellSouth for termination in Tennessee? If not, state why not.
8. For those calls on which Global Crossing did not provide a calling party number to BellSouth during the period from January 1, 1994 to the present, state the reasons a calling party number was not provided.

9. Describe with specificity the process used by Global Crossing in Tennessee to verify correct routing of calls over the proper facilities according to jurisdiction.

10. Provide a description of the PIU and PLU processing systems employed by Global Crossing in Tennessee including a description of the application which produces reports of minutes of use ("MOU") by trunk group and call type.

11. State the number of calls, by month, that are originated by Global Crossing and terminated to BellSouth in Tennessee where the calling party number is absent from the SS7 call record from January 1, 1994 to the present.

12. Describe with specificity the network architecture utilized by Global Crossing in Tennessee, including trunking arrangements and the type of signaling used by Global Crossing.

13. State the total number of retail customers served by Global Crossing, by month, from January 1994 to the most current month available. For each such customer, state whether the customer is a residential or business customer.

14. State the total number of wholesale customers served by Global Crossing, by month, from January 1994 to the most current month available.

15. Provide a list of Global Crossing's originating and terminating trunk groups and their corresponding billing account numbers.

16. Provide a list of billings from BellSouth to Global Crossing in Tennessee for switched access services (for PIU purposes) for the period January 1994 to the present.

17. Provide a list of billings to Global Crossing in Tennessee from any local exchange provider other than BellSouth for the period January 1994 to the present.

18. Identify by product and company name all software systems used by Global Crossing, from 1994 to the present, to collect call detail information, and, specifically, identify whether Global Crossing uses or has used the Agilent Company product known as Business Intelligence System.

REQUESTS FOR PRODUCTION

1. Produce electronic copies of Global Crossing's customer billing records in Tennessee for the last two years.

2. Provide copies of all customer billing records that reflect the billing from customer use of Global Crossing's 10XXX "dial-around" dialing protocol.

3. Produce all documents referring, relating or pertaining to any arrangements Global Crossing has with other telecommunications providers to route or transport telecommunications traffic on behalf of such other telecommunications providers.

4. Produce Global Crossing's 10-K filings for 1994 through the present.

5. Produce all contracts, agreements, letters of intent or other documents referring, relating or pertaining to a relationship between Global Crossing and another telecommunications provider for purposes of Global Crossing's transport of traffic from the telecommunications provider to BellSouth (or any other local exchange provider).

6. Produce all documents Global Crossing contends support the PIU reported by Global Crossing to BellSouth.

7. Provide all documents referring, relating or pertaining to the calling party number for each and every call transported by Global Crossing to BellSouth for termination from the period January 1, 1994 to the present.

8. Produce all data Global Crossing contends supports the PIU reported by Global Crossing to BellSouth, including all records of call detail from which the percentage of interstate and intrastate use can be ascertained.

9. Produce all call detail records, such as workpapers and/or backup documentation including paper, magnetic tapes or any other form of records for billed Global Crossing traffic, call information including call terminating address, the call duration, all originating and terminating trunk groups or access lines over which the call is routed and the point at which the call enters the Global Crossing network.

10. Produce all documents identified in response to the Interrogatories set forth above.

11. Produce all network reports that include information from each of the originating and terminating trunk groups used by Global Crossing, including the trunk type, direction of usage (originating/terminating), service area and vendor.

12. Produce all documents referring, relating or pertaining to the manner in which calls are processed as "interstate," "intrastate" or "local" by Global Crossing.

13. Produce all documents referring, relating or pertaining to the manner in which Global Crossing accounts for "ring no answer" calls, calls that are dropped, as well as any error processing that must be performed to account for difficulties in processing call detail records due to errors in data transmission.

14. Produce all documents referring, relating or pertaining to any changes and/or modifications made to Global Crossing's PIU and PLU processing systems during the previous two years.

15. Produce any and all directives, memoranda, documents, notes, or files of any type dealing in any way with the audit conducted by Price-Waterhouse Cooper, including but not limited to any communications between Global and Price-Waterhouse Cooper relating to Feature Group D and/or the FCC's 1985 "entry/exit surrogate" order.

16. The entire contents of the file maintained by Robert Steger, Vice President - Cost of Access, including but not limited to any memoranda, notations or notes dealing with Feature Group D and/or the FCC's 1985 "entry/exit surrogate" order.

17. Any and all internal and/or external audits performed by or for Global Crossing of Global Crossing's Cost of Access systems used to calculate Global Crossing's percentage of interstate usage (PIU) from 1994 to the present.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By: 

Guy M. Hicks

Joelle J. Phillips

333 Commerce Street, Suite 2101

Nashville, TN 37201-3300

615/214-6301

Wayne T. McGaw (La. Bar #9302)

365 Canal Street, Room 3060

New Orleans, LA 70130